

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

MEI PANG,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

CORE SCIENTIFIC INC., MICHAEL LEVITT,
MICHAEL TRZUPEK, and DENISE
STERLING,

Defendants.

Case No. 1:22-cv-01191

**CLASS ACTION COMPLAINT FOR
VIOLATIONS OF THE FEDERAL
SECURITIES LAWS**

**STIPULATION TO EXTEND TIME
FOR DEFENDANTS TO RESPOND TO THE COMPLAINT**

WHEREAS, on November 14, 2022, Plaintiff filed a putative class action complaint (the “Complaint”) alleging violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934;

WHEREAS, the above-captioned action is governed by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 et seq. (the “PSLRA”);

WHEREAS, Plaintiff published notice of the action in accordance with the requirements of Section 21D(a)(3)(A)(i) of the PSLRA, 15 U.S.C. § 78u-4(a)(3)(A)(i), on November 14, 2022, triggering a sixty-day deadline under the PSLRA, until January 13, 2023, for “any member of the purported class” to move the Court to serve as lead plaintiff, 15 U.S.C. § 78u-4(a)(3)(A)(i)(II);

WHEREAS, pending resolution of any motion for the appointment of a lead plaintiff, it is unclear which putative class members will ultimately have the authority to act on behalf of the putative class and whether the Court-appointed lead plaintiff will file an amended complaint; and

WHEREAS, counsel for the parties have met and conferred and agree that, in the interests of judicial economy, conservation of time and resources, and orderly management of this action, it would be more efficient to extend the time for Defendants to answer or otherwise respond to an operative complaint until after the Court's appointment of a lead plaintiff;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties, subject to the approval of the Court, that:

1. The undersigned counsel for Defendants are authorized to accept, and hereby do accept, service of the Complaint on behalf of Defendants, without prejudice to or waiver of any of Defendants' defenses, objections, or arguments, except as to the sufficiency of service of process;
2. Defendants shall not be required to answer, move against, or otherwise respond to the Complaint at this time; and
3. Within 14 days after the Court's appointment of a lead plaintiff pursuant to the PSLRA, the Court-appointed lead plaintiff and Defendants shall confer regarding, and submit to the Court for approval, a proposed schedule for the filing or designation of an operative complaint and for Defendants' responses thereto.

Dated: December 9, 2022
Dallas, Texas

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